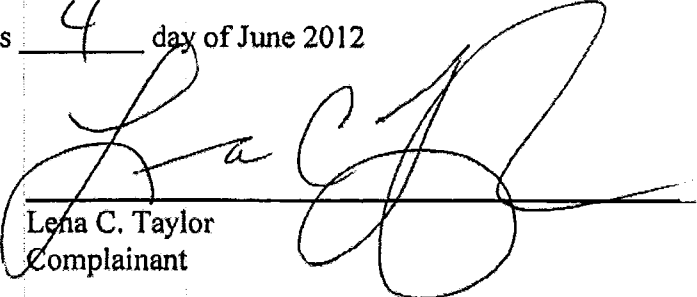


VERIFICATION

Lena C. Taylor, being first duly sworn, on oath, deposes and says as follows:


1. That she is an elector and a resident of the City and County of Milwaukee, Wisconsin and resides in the 4th State Senate District and is the current State Senator for the 4th Senate District.
2. That she has read the foregoing Verified Complaint and that the same is true and correct, except as to those matters therein stated upon information and belief and, as to those matters, she believes them to be true.

Dated at Milwaukee, Wisconsin this 4 day of June 2012



Lena C. Taylor
Complainant

Subscribed and Sworn to before
me this 4 day of June 2012.



Notary Public, State of Wisconsin
My Commission [Expires _____] [Is Permanent].

STATE OF WISCONSIN:

BEFORE THE GOVERNMENT ACCOUNTABILITY BOARD

IN THE MATTER of the Nomination
Papers Filed By David King with Respect to
the November 6, 2012 Election for the 4th
State Senate District

File No. _____

VERIFIED COMPLAINT OF LENA C. TAYLOR

The Complainant, Lena C. Taylor, by his attorneys Maistelman & Associates, LLC by Attorney Michael S. Maistelman, alleges and shows as follows:

1. The Complainant, Lena C. Taylor ("Complainant"), is an elector of the City and County of Milwaukee residing at 1518 W. Capitol Drive, Milwaukee, Wisconsin and currently holds the office of Senator for the 4th State Senate District.
2. The Respondent, David King ("Respondent"), is upon information and belief a candidate in the November 6, 2012 Election for the 4th State Senate District and whose address is listed as 2407 A N. Pierce Street in the City and County of Milwaukee, Wisconsin.
3. On or about June 1, 2012, Respondent filed with the Government Accountability Board ("GAB") his nomination papers.
4. Upon information and belief, Respondent's Nomination papers were allegedly circulated between May 5, 2012 and June 1, 2012.

5. Respondent's Nomination papers allegedly consisted of a sufficient number of signatures so as to equal 400 (four hundred) signatures, the amount required for placement on the ballot for November 6, 2012 Election for the 4th State Senate District. Petitioner is not aware of how many of Respondent's nomination signatures the GAB has accepted or rejected.

CHALLENGES TO INDIVIDUAL SIGNATURES

6. All of the preceding paragraphs are re-alleged and incorporated as if fully stated herein.

7. The following pages are not in the 4th Senate District: Page 1, Lines 9, Page 2, Line 10, Page 4, Line 8, Page 5, Line 6, Page 5, Line 7, Page 5, Line 8, Page 6, Line 1, Page 11, Lines 3 & 4, Page 13, Lines 2, 7 & 10, Page 15, Lines 3 & 5, Page 16, Line 3, Page 17 Lines 1, 2 & 7, Page 20, Line 4, Page 22, Line 9, Page 25, Lines 3, 6 & 8, Page 26, Lines 4 & 5, Page 27, Line 2, Page 28, Line 9, Page 29, Line 10, Page 30, Line 2, Page 30 Lines 2, 3, & 7, Page 31, Line 7, Page 32, Line 6, Page 33, Line 4, Page 35, Line 5, Page 38, Lines 6 & 9, Page 40, Line 4, Page 41, Lines 6 & 7, Page 47 Lines 2, 5, 9 & 10, Page 48, Lines 2 & 5, Page 50, Lines 3 & 7.

8. Page 3, Lines 2, 3 & 10 addresses do not exist and if they did exist are out of the Senate District.

9. Page 4, Lines 2 & 4 Signed by the same person.

10. Page 13, Line 9 Address not provided/illegible.

11. Page 23, Line 6 Address not provided/illegible.

12. Page 35, Lines 7 Address does not exist.

13. Page 37, Lines 7 Address not provided/illegible.

14. Page 5, Line 1 date after certification.

15. Page 5, Line 2 no date.

16. Page 5, Line 3 date after certification.
17. Page 8, Line 3, incorrect date.
18. Page 15, Line 1, no municipality and no date listed.
19. Page 15, Line 2, no date.
20. Page 19, Line 1, no date.
21. Page 22, Lines 1, 2, 3 & 4 no date.
22. Page 25, Line 1 no date.
23. Page 26, Line 2 no date.
24. Page 28, Lines 1, 2, 3, 4, 5, 6, & 7 no dates.
25. Page 41, Lines 1, 2, 3, & 4 no dates.
26. Page 42, Lines 3 & 8, no municipality.
27. Page 44, Lines 1, 2, & 3 no dates.
28. The following pages and line numbers do not list the correct municipality:

Page 2, Lines 6 & 7, Page 3, Line 5, Page 4, Lines 1, 2, 3, 4, 5, 6, 9, & 10, Page 5, Lines 1 & 7, Pages 6 Line 2, 4, 5, 6, & 7, Page 7, Line 9, Page 9, Line 3, 4, 5, 6, 7, 8, & 10, Page 11, 2, 3, 4, & 10, Page 12, Lines 4 through 10, Page 13, Lines 4 through 6, Page 14, Line 4, Page 15., Lines 6 & 7, Page 17, Lines 1 through 4, Page 18 Lines 6 through 10, Page 19, Lines 7 & 8, Page 21, Lines 2 through 10, Page 23, Lines 1 through 4 and 6 through 8, Page 24, Lines 1 through 8 and 10, Page 25, Lines 1 through 10, Page 27, Lines 5 through 9, Page 28, Lines 1, & 4 through 10. Page 29, Line 3, Page 30, Lines 1, 2, 6, 7, 8, 9, & 10, Page 31, Lines 5, 6, & 10, Page 32, Line 6, Page 33, Lines 4, 5, 6, & 9, Page 34, Lines 1 & 2, Page 36, Line 3, Page 38 Line 10, Page 39 Lines 3 through 7, Page 42, Lines 4 through 7, Page 44, Lines 1 & 3, Page 45, Lines

4, 5, & 6, Page 46, Lines 2, 4, 5, 6, 9 & 10, Page 48, Line 4, Page 49, Line 8, 9, & 10, Page 50,
Line 1.

CONCLUSION

29. Accordingly, Respondent has not submitted a sufficient number of signatures to be placed on the ballot for the November 6, 2012 election for the 4th State Senate District.

30. This Verified Complaint is made pursuant to § El Bd 2.07(1), Wis. Admin. Code, and § 9.10(3)(b), Wis. Stats., and pursuant to § El Bd 10.03(6), Wis. Admin. Code, was served on Respondent via U.S. mail postage prepaid prior to filing.

WHEREFORE, Complainant respectfully requests that the GAB conduct an investigation pursuant to § El Bd 2.07(5), Wis. Admin. Code, in conjunction with such other public officials as the GAB, or the Executive Director thereof, may deem appropriate and determine the Nomination papers of the Respondent to be insufficient for the reasons set forth in this Verified Complaint.

Dated at Milwaukee, Wisconsin this 4th day of June 2012.



By: _____
Michael S. Maistelman
State Bar No. 1024681
Dennis R. Krueger
State Bar No. 1009923
Attorneys for Complainant

P.O. ADDRESS:
5027 W. North Avenue
Milwaukee, Wisconsin 53208
(414) 908-4254